

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARCELINO ANDRADE, BERENICE)	
JACINTO, AMERICA GARCIA, ORALIA)	
PALACIOS, MIGUEL RUBIO, ISMAEL)	
ANDRADE, JOSE HERNANDEZ, LUCIA)	
PORTILLO, RENE CORDOBA, and)	
FRANCISCO MEDINA, on behalf of themselves)	Case No. 08CV4912
and all other persons similarly situated, known and)	
unknown,)	Judge Manning
)	
Plaintiffs,)	Magistrate Judge Denlow
)	
v.)	
)	
IDEAL STAFFING SOLUTIONS, INC., UAL,)	
INC., ALITALIA AIRLINES, SINGAPORE)	
AIRLINES, GATE GOURMET, INC., AIR)	
MENZIES INTERNATIONAL (USA), INC.,)	
SWISSPORT CARGO SERVICES, INC.,)	
APEX PLASTIC FINISHING COMPANY, JD)	
NORMAN INDUSTRIES, INC. and DIEGO)	
DEASTIS, individually,)	
)	
Defendants)	

**MOTION OF DEFENDANT, JD NORMAN INDUSTRIES, INC., TO
ENLARGE THE TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant, JD NORMAN INDUSTRIES, INC. ("JDNI"), by its attorneys, pursuant to Fed. R. Civ. P. 6(b), moves for an enlargement of time from September 4, 2008 to November 3, 2008, to respond to the Complaint filed by Plaintiffs. In support of this Motion, Defendant JDNI states as follows:

1. On July 17, 2008, Plaintiffs filed a Complaint against Defendant JDNI and others in the Circuit Court of Cook County, Illinois, Chancery Division. The Complaint raises various claims under the Fair Labor Standards Act, 29 U.S.C. §201, *et. seq.* and various state statutes.

The Complaint also purports to raise claims on behalf of similarly situated known and unknown plaintiffs.

2. On August 27, 2008, Defendant UAL, Inc. timely removed the case to this Court.

3. Due to the nature of the claims raised and the number of parties involved, counsel for Defendant JDNI requires additional time to investigate and evaluate the claims made in the Complaint, as well as to prepare and file its response to the Complaint.

4. Accordingly, Defendant JDNI requests an additional sixty days from September 4, 2008 to November 3, 2008, to answer or otherwise plead in response to Plaintiffs' Complaint.

5. Defendant UAL, Inc. filed its motion requesting a sixty-day extension of time to file an Answer or other responsive pleading. Other defendants may file similar motions requesting the same relief.

6. Counsel for Defendant JDNI contacted counsel for Plaintiffs to request his agreement to a sixty-day extension, but did not received any response by the time this Motion was filed.

7. This is Defendant JDNI's first request for an enlargement of time to answer or otherwise plead. This Motion is being brought in good faith and not for the purpose of undue delay. A sixty-day extension of time will not unduly burden the parties given that other defendants have requested a similar extension.

WHEREFORE, Defendant JD NORMAN INDUSTRIES, INC. respectfully request that the Court grant it a sixty-day extension of time up to and including November 3, 2008, to file its answer to Plaintiffs' Complaint or to otherwise respond to the Complaint, and grant such other relief as the Court deems just.

Respectfully Submitted,
JD NORMAN INDUSTRIES, INC.

BY: /s/: Lauren Blair
One of Its attorneys

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